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**FILED**

LOS ANGELES SUPERIOR COURT

OCT 28 2008

JOHN A. CLARKE, CLERK

BY: *J. Arismendez*  
J. ARISMENDEZ, DEPUTY

Attorneys for Specially Appearing Interested Party  
**WRIGHT ENTERTAINMENT GROUP, LLC,**  
**and WRIGHT ENTERTAINMENT GROUP,**  
**INC.**

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

In Re the Conservatorship of the Person and  
 Estate of:

BRITNEY JEAN SPEARS,

Temporary Conservatee.

CASE NO. BP 108870

DATE: October 28, 2008

TIME: 8:30 a.m.

DEPT: 9

JUDGE: Commissioner Reva Goetz

**DECLARATION OF MATTHEW K.  
 ASHBY IN SUPPORT OF *EX PARTE*  
 APPLICATION FOR *PRO HAC VICE*  
 ADMISSION OF CLAY TOWNSEND  
 PURSUANT TO CALIFORNIA RULE  
 OF COURT, RULE 9.40**

[Filed concurrently with: Ex Parte  
 Application]

I, Matthew K. Ashby, declare:

1. I am employed with the law firm of McKenna Long & Aldridge LLP ("MLA"),  
 counsel of record for WRIGHT ENTERTAINMENT GROUP, LLC, and WRIGHT  
 ENTERTAINMENT GROUP, INC., (hereinafter referred to collectively as "WEG"). I am a  
 member in good standing of the State Bar of California. I have personal knowledge of the facts  
 set forth in this Declaration and, if called as a witness, could and would testify competently to  
 such facts under oath.

DECLARATION OF MATTHEW K. ASHBY IN SUPPORT OF *EX PARTE* APPLICATION FOR *PRO HAC VICE* ADMISSION OF  
 CLAY TOWNSEND PURSUANT TO CALIFORNIA RULE OF COURT, RULE 9.40

LA:17330256.1

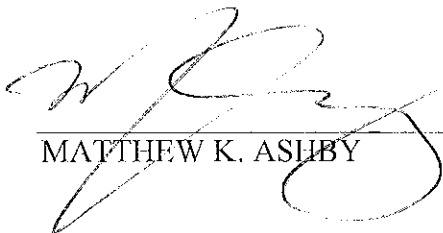
1           2.       All parties were given notice of this *ex parte* application by means of a letter  
2 which was transmitted by facsimile machine on Monday, October 27, 2008, before 10 a.m.  
3 Pacific Standard Time. A true and correct copy of the letter giving *ex parte* notice is attached as  
4 **Exhibit "A."**

5           3.       MLA has prepared a check in the amount of \$50.00 on behalf of Clay Townsend,  
6 which has been sent via Federal Express to the State Bar of California, San Francisco office, as  
7 required pursuant to California *Rules of Court*, Rule 9.40. Along with the check, this office set a  
8 copy of the *ex parte* application and supporting papers for Mr. Townsend's application to be  
9 admitted counsel *pro hac vice* in this matter. A true and correct copy of the transmittal letter and  
10 the check is attached as **Exhibit "B."**

11           4.       As counsel for WEG, Mr. Townsend will not become so absorbed in matters  
12 outside of California, where the proceedings in this matter will be disrupted in any manner.  
13 Additionally, MLA will be able to manage and control all aspects of the litigation on a daily  
14 basis.

15           5.       A true and correct copy of Clay Townsend's declaration in support of his  
16 application for *pro hac vice* admission is attached as **Exhibit "C"**.

17           I declare under penalty of perjury under the laws of the State of California that the  
18 foregoing is true and correct and that this Declaration was made this 27<sup>th</sup> day of October, 2008, at  
19 Los Angeles, California.

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22 MATTHEW K. ASHBY  
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*Attorneys  
At Law*

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October 27, 2008

Via email: jcohen@luce.com  
& facsimile (213) 892-7731

Jeryll S. Cohen, Esq.  
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Via email: awallet@handwlaw.compmqnlcc@dpp.gov  
& facsimile (310) 473-1730

Andrew Wallet, Esq.  
(Co-Conservator)  
Hinojosa & Wallet  
2215 Colby Avenue  
Los Angeles, CA 90064

RE: Wright Entertainment Group, LLC et al v. Britney Spears & BTI  
Orange County Circuit Court Case No.: 48-2007-CA-014233-O  
Los Angeles Superior Court Case No.: BP-108870

Dear Jeryll and Andrew:

Please take notice that the Plaintiffs, Wright Entertainment Group, LLC and Wright Entertainment Group, Inc., in the above referenced Orange County Circuit Court Case will be appearing ex parte at 8:30 a.m. on Tuesday, October 28, 2008 in Department 9 of the Los Angeles Superior Court, located at 111 North Hill Street, Los Angeles, California, in the Los Angeles Superior Court Case referenced above for an Order Approving Pro Hac Vice Admission of Clay M. Townsend pursuant to California Rules of Court Rule 9.40.

I again ask that you withdraw your application for a protective order given your stipulation to Florida jurisdiction and the Florida court's order. We have incurred, and continue to incur, costs and fees related to this application for which we will seek payment.

Please let us know if you intend to oppose the pro hac vice application. Thank you for your prompt attention to this matter.

Yours Truly,

Clay M. Townsend

CMT/ifu

cc: Bill Wilson (via email [bill.wilson@hklaw.com](mailto:bill.wilson@hklaw.com)/ facsimile (407) 244-5288)  
Judy Mercier (via email [judy.mercier@hklaw.com](mailto:judy.mercier@hklaw.com)/ facsimile (407) 244-5288)  
Jorge Hernandez-Torano (via email [jorge.hernandez-torano@hklaw.com](mailto:jorge.hernandez-torano@hklaw.com)/ facsimile (305) 789-7799)  
Farah Nicol (via email [fnicol@mckennaalong.com](mailto:fnicol@mckennaalong.com)/ facsimile (213) 243-6330)

For The People

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KATHERINE V. HUNG  
J. MICHAEL PAPANTONIO  
CLAY M. TOWNSEND

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CIVIL TRIAL LAWYER  
\* BOARD CERTIFIED  
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LAWYER

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\*\*\* LICENSED IN WASHINGTON, D.C. ONLY  
\*\*\*\* LICENSED IN GEORGIA ONLY  
\*\*\*\*\* LICENSED IN MISSISSIPPI ONLY  
^ LICENSED IN NEW YORK  
‡ LICENSED IN FLORIDA

§

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**Exhibit B**

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Denver  
Los Angeles

**McKenna Long  
& Aldridge**<sup>LLP</sup>  
Attorneys at Law

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EMAIL ADDRESS  
mashby@mckennalong.com

October 27, 2008

**BY FEDERAL EXPRESS**

State Bar of California  
180 Howard Street  
San Francisco, California 94105

**Re: Johnny Wright Entertainment Group, LLC v. Britney Spears, et al.**  
**Orange County Circuit Court Case No.: 48-2007-CA-014233-O**  
**Los Angeles Superior Court Case No.: BP-108870**

Dear Sir or Madam:

Enclosed is a copy of the *pro hac vice* application and supporting papers for Clay Townsend to be filed by this office on behalf of our client, Johnny Wright Entertainment Group, LLC, in the referenced action pending in Los Angeles County. Pursuant to Rule 9.40 of the California *Rules of Court*, we also have enclosed a check in the amount of \$50.00 representing the required fee for the application.

If you have any questions regarding the above, please feel free to contact us.

Very truly yours,

  
Matthew K. Ashby

MKA:emg

Enclosures

LA 7330262.1

CHECK DATE  
10/27/08

SunTrust Bank, Atlanta  
Atlanta Georgia

64-10/610

**MCKENNA LONG & ALDRIDGE LLP**

**ATTORNEYS AT LAW**  
ONE SUNTRUST PLAZA  
SUITE 5300, 303 PEACHTREE STREET  
ATLANTA, GEORGIA 30308 (404)527-4000

**CHECK # 165528**

CHECK AMOUNT

**\$50.00**

THE SUM OF  50 dols 00 cts  
five zero dollars zero zero cents

PAY TO THE  
ORDER OF

**STATE BAR OF CALIFORNIA  
180 HOWARD ST.  
SAN FRANCISCO, CA 94105**



DIRECTOR OF FINANCE

GENERAL ACCOUNT

VOID AFTER 180 DAYS

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES**

In Re the Conservatorship of the Person and  
Estate of:

BRITNEY JEAN SPEARS,

Temporary Conservatee.

CASE NO. BP 108870

DEPT: 9

JUDGE: Hon. Reva Goetz

**DECLARATION OF CLAY  
TOWNSEND**

I, Clay Townsend, declare:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of Florida. I am a member of the firm of Morgan & Morgan, P.A. I submit this declaration in support of the attached *Ex Parte* Application to be admitted *pro hac vice* to appear before this Court in this matter. I have personal knowledge of the facts set forth herein, and, if called upon to testify, I could and would testify competently to such facts.

2. My home address is 3008 Troy Drive, Orlando, Florida. I work at Morgan & Morgan, P.A., located at 20 North Orange Avenue, Orlando, Florida. I am not regularly employed in the State of California, nor am I regularly engaged in substantial business, professional or other activities in the State of California.

DECLARATION OF CLAY TOWNSEND

LA-#17330112-v1-PHV\_declaration\_of\_Clay\_Townsend (2). DOC LA:17330112.1

1           3.     I am an active member in good standing of the State Bar of Florida, and have been  
2 admitted to practice before the following courts:

3	<u>Court</u>	<u>Date</u>
4	a.     U.S. District Court Southern District of New York	10/08/08
5	b.     U.S. District Court Middle District of Florida	03/03/04
6	c.     U.S. District Court District of Arizona	10/01/04

7           4.     I am a member in good standing in each of the above-described courts.

8           5.     I have not been suspended or barred from any court.

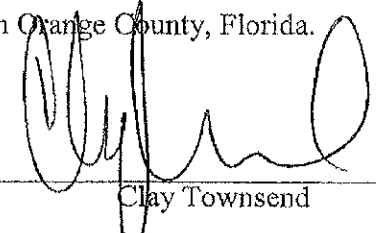
9           6.     Wright Entertainment Group, LLC, and Wright Entertainment Group, Inc., have  
10 retained and have designated as co-counsel in this matter Farah Nicol, Matthew Ashby, and the  
11 law firm of McKenna Long & Aldridge LLP. It is my understanding that Ms. Nicol and Mr.  
12 Ashby are active members in good standing of the State Bar of California and are admitted to  
13 practice before all courts of the State of California. Ms. Nicol and Mr. Ashby maintain their  
14 office in the Los Angeles, California offices of McKenna Long & Aldridge LLP, located at 444  
15 South Flower Street, Suite 800, Los Angeles, California 90071, telephone: (213) 688-1000.

16           7.     I am not a member of the State Bar of California, but I am familiar with and agree  
17 to comply with the standards of professional conduct required of members of the State Bar of  
18 California and contained in the State Bar Act, the Rules of Professional Conduct of the State Bar  
19 of California, and decisions of any Court applicable thereto, which have been adopted as  
20 standards of professional conduct of this Court.

21           8.     In the last two years, I have not been admitted *pro hac vice* in California in any  
22 matter.

23           I declare under penalty of perjury under the laws of the State of California that the  
24 foregoing is true and correct.

25           Executed this 27<sup>th</sup> day of October, 2008, in Orange County, Florida.

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\_\_\_\_\_  
Clay Townsend